



ENVIRONMENTAL
PROTECTION AGENCY

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Registration Information

Owner or operators name
Facility name and location # I.D. number

Tank Information
number of tanks
installation date
capacity
construction
substance stored

Piping Information

Release Detection Methods

Corrosion Protection Systems

Spill and overflow prevention methods

Financial responsibility

Diagram of facility

Records - Tank Registration

Release Detection Monitoring
Corrosion Protection Testing
Financial Responsibility

Repair and Maintenance

Federal regulations define repairs as meaning "to restore a tank or UST system component that has caused a release of product from the UST system."

Release Detection Records

- Equipment Manufacturer Performance Claims must be kept for at least 5 years.
- Monitoring Results - at least 1 year except TTT which must remain on file until the next test. This includes any function or operability tests of the testing system itself.
- Records of maintenance, repair or calibration must be on file at least 1 year. Maintenance and calibration must be performed in accordance with the manufacturer's instructions.

These release detection methods may be used with both tanks and piping.

- Vapor Monitoring - Must be done every 30 days and records maintained for 1 year.

Also check for:

Require records of site assessments

- ① Correct number/position of wells
- ② Porous backfill
- ③ Volatile product
- ④ Water does not interfere
- ⑤ No background contamination

- Groundwater Monitoring - Every 30 days and records for 1 year.

- ① GW no more than 20' b.g. and porous soil
- ② MWs properly designed and sealed
- ③ MWs in UST backfill or as close as feasible.
- ④ Substance must float and not easily mix with H₂O.

⑥ Check manufacturer's records to be sure that the monitoring equipment can detect $\frac{1}{8}$ " or less of product on top of g.w.

→ Interstitial Monitoring - Every 30 days and records for 1 year.

① Manufacturer's claims: Must be able to detect a release from any portion of the piping or tanks.

② Sensor testing: Some manufacturers require annual testing. Results must be maintained.

③ Liners: Must always be above g.w. table and the 25 year flood plain unless appropriately designed.

→ Statistical Inventory Reconciliation Records - Every 30 days and records for 1 year.

① Inconclusive of fail - EPA considers that the facility has not performed release detection for that month. EPA allows some states discretion on inconclusive.

② Vendor reports should identify:

- Name of vendor
- Name of facility
- Which tanks were tested
- Number of days of data
- Measured leak rate
- Threshold
- Minimum detectable leak

Release Detection for Tanks only

→ Inventory Control & Tank Tightness Testing - Inventory control involves measuring and tracking product data each operating day. It must be done in combination with TTT. Inventory control records must be kept for 1 yr.

Inventory Control

- Daily Measurements
- Delivery Measurements
- 30-day reconciliation
- Measurements with allow range - if exceeds for 2 months must notify regulatory agency

TTT

- Records must be kept until next test-up to 5 years. Cannot be used beyond 10 years from tank installation.

→ Manual Tank Gauging Records (only for tanks 2000 gal. or <)

Time out of Service	Weekly Std.	Monthly Standard
551 - 1000 64" D	44 hrs	9 gal
551 - 1000 48" D	58 hrs	12 gal
551 - 1000	36 hrs	13 gal
1001 - 2000	36 hrs	26 gal

- Weekly testing with 2 readings (when taken out of service and 2 hours later)
- Reconcile every 4 weeks - compare to monthly standard

TTT if required:

- Records maintained until next test-up to 5 yrs
- Method cannot be used beyond 10 yrs from tank installation.

→ Automatic Tank Gauging - at least every 30 days, records maintained for 1 year.

Piping Release Detection Records - Pressurized Records Associated With Corrosion Protection

→ Automatic Line Leak Detectors

- Review manufacturer's claims - must be able to detect 3 gph @ 10 PSI within 1 hr.
- Must be tested annually by manufacturer's representative

→ Records for Line Tightness Testing or Monthly Monitoring

- Appropriate monthly monitoring must be done every 30 days - records kept for 1 yr.
- If no monthly monitoring done then a record of the most recent line tightness test that tests the line at 0.1 gph leak rate at 1.5 times the operating pressure must be available. Record must indicate that the test was conducted within the past year.

Piping Release Detection Records - Suction

→ Records for Line Tightness Testing or Monthly Monitoring

- Monthly monitoring must be done every 30 days and records maintained for 1 year.
- If monthly monitoring is not performed then a record of the 3 year LTT that can detect a leak of 0.1 gph @ 1/2 times the operating pressure must be maintained

→ R.D. Records not required for Safe (European) Suction Piping

- Piping operates at < atmospheric pressure
- Piping sloped so content drains back to tank
- Only one check valve in line and it must be directly below and as close as practical to the suction pump.

First, identify type of C.P. for all components and number of lined tanks and components made of non-corrodible material.

→ Records for Galvanic Cathodic Protection Systems

- Within 6 months of the Cathodic Protection systems installation
- Within 6 months of any repairs to the UST system
- At least once every 3 years

* The facility is required to keep the facility's 2 most recent test results.

→ Records for Impressed Current Cathodic Prot. Systems

- Within 6 months of the C.P. Systems installation
- Within 6 months of any repair to the UST system
- At least once every 3 years

* The facility is required to keep the 2 most recent test results

I.C. Systems also required to be inspected every 60 days to confirm that the rectifier is on and working within normal operating range.

The instant off potential must be -850 mV or greater or polarization decay must be at least 100 mV.

What to look for in the records of the 60 day rectifier inspection?

- Are the voltage and amperage readings in the normal range - if not has a corrosion expert examined and adjusted the system?
- Review previous inspection and hour meter to insure that system has operated continuously. If not, why?

Records for Internally Lined Tanks

- Lined Tanks must be inspected by trained professionals within 10 years of lining application and every 5 years thereafter
- If a facility's tanks rely on internal lining for corrosion protection check the records to insure that:

- The tank was installed prior to 1988
- The lining passed inspection.
- Inspections were conducted within 10 years of being lined and every 5 years thereafter.

- CP can be combined with lining. All records pertaining to both C.P. and internal lining must be maintained.

- * Lining only suitable for tanks. All other metal components that regularly contain product and that are in contact with soil require Cathodic Protection.

Non-corrodible Materials - made with, clad with or jacketed with non-corrodible materials such as fiberglass reinforced plastic (FRP) or thermoplastics.

- Tanks or other UST components made with, clad with or jacketed with these materials do not need corrosion protection.

Cathodic Protection Repair Records

- * Must be kept for life

- Check that repair records are available including lining repairs.
- If any changes were made to the C.P. System, confirm that those changes were approved by a corrosion expert.
- Compare the date the problem was noted and the repair date to see if corrections were made in a timely manner.
- Check that the Cathodic Protection System was retested within 6 months of the repair.

- * If repairs were made to Any portion of an UST system with either Galvanic or Impressed Current cathodic protection, the cathodic protection must be tested within 6 months of the repair.

Records for Repairs to Tanks and Piping, and Release Reporting

- * Definition - to restore a tank or UST system component that has caused a release of product from the UST system.

- * Facilities must keep records of repairs to UST System for the life of the equipment.
33(f) ^{an accepted}
- Were repairs in accordance with a code of practice? For FRP Tanks - were repairs made by a manufacturer's authorized representative?

- Were repairs made following a release? If metal piping or fittings released product due to corrosion or other damage, they must be replaced.
- If the repaired item is not monitored every 30 days through a standard release detection method, check records to see if tightness testing was conducted within 30 days of repair.
- Was leaking UST system placed out of service? Check inventory records

Release Reporting:

- * All releases or suspected releases must be reported including spills and overfills.
- * When a method of release detection indicates a release may have occurred, owners and operators of UST systems must notify the appropriate agency within 24 hrs.
 - Product is discovered
 - Erratic behavior of dispensing equipment
 - Sudden loss of product from UST system
 - Unexplained water in tank

Spills, Overfills and Confirmed Releases

- < 25 gallons - if cleaned up within 24 hrs release does not need to be reported.
- > 25 gallons - Must be reported within required time period.
 - or causes a sheen on surface water
- Suspected releases must be investigated and confirmed and reported within 7 days

Financial Responsibility Records

- Financial Responsibility Mechanism
- Amount of financial responsibility
- Scope of financial responsibility
- Certification
 - Type of mechanism
 - Name of Issuer
 - Mechanism Number (if applicable)
 - Amount of Coverage
 - Effective period of coverage

Certification must specify the scope of the financial responsibility and clearly state which elements are covered by each mechanism.

- Taking corrective actions and/or
- Compensating third parties for bodily injury and property damage as well as sudden and non-sudden accidental releases.

Owners and operators must maintain mechanism-specific documentation. The documentation must be worded exactly as spelled out in the regulations.

40 CFR 280.11

Group of UST Owners and Operators	Per Occurrence Coverage	Aggregate Coverage
Group 1: Petroleum Producers, refiners and marketers	\$1 million	\$1 million for 100 or fewer tanks
Group 2: Non-marketers	\$500,000 if throughput is 10,000 gal/mo or less, or \$1 million if more than 10,000 gal/mo	\$2 million for more than 100 tanks

Middletown Food Mart Inc. 8/28/2012
176 ^{W. 2nd St.} Main St.
Middletown, NY 10940

No 2 Annular Sensor (Veeder-Root No.)
was non functional from at
least 12/19/2011 - 8/17/2012.

Normal readings on 12/12/2011 and
8/13/2012. The non-functioning
sensor was on the Reg./Premium Tank.
CSLD passing results were available
for the Reg and Premium tanks.
Only one of the two diesel
compartments had CSLD monitoring,
however the Liquid Status
passing results were available
for the year on that tank.

The regular and premium are a
compartmentalized tank as
are both diesel tanks

8/18/2012
8:17 AM
P.M.

Chestnut Mart of: Gardiner
604 RTE 208, Gardiner, NY 12525

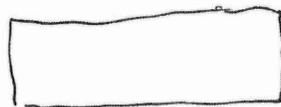
arrived at 10:00 AM - Sunny & hot
observed 3 steel tanks with the
cover soil removed. Mart is
closed. CPD Rep ^{Edgar} said it has been
closed for about 3 months.

Returned 12:17 PM

Returned to stick tanks to
determine product level for
closure classification.

Edgar joined by Joe
McCormick, CPD Environmental
Manager - stated site closed about 3 weeks

Tanks



--- : 3/4"

--- : 1/2"

--- : Dry

Island

0mw 0mw

Aug. 2008

Drawn by

F. Miller

8/28/2012

Mobil Service Station
290 Route 211 East
Middletown, NY 10940

Test 0.1 ~~5 point~~ ¹ P.M. 2 wire CL
Oct, Nov 2011 and Aug 2012

No Leak Detection CSLD chip

~~SD no leak detection was~~
performed within the last
year apparently.

Joe McCorvick a CPD
environmental representative
is going to look and see
if they can find an annual
tank tightness test record

Overfill alarm functional

8/28/2012

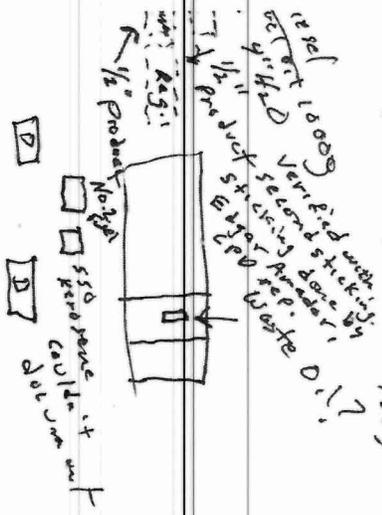
Chestnut Mart of Middletown Inc
650 Route 211 East
Middletown, NY 10941

Sonoza No current tank registration
form - Later found
CSLD Results for the past
year (passing) were available
for review, however it appears
only one regular tank is
being monitored -

Tank 4 on the Tank Reg Form is
listed as steel, yet there is
no evidence of C.P.

9/16/2012

Chestnut Mearns Inc.
170 Saw Mill River Road
Mount Pleasant, NY



No tanks are locked secured.

What's Doing Phase I Study

Records site - when it became inactive
Records of pumping tanks empty -

Metal Flex connector on Dispenser is in contact with soil (see photos) and does not have cathodic protection,

CPD Energy Corp

9/6/2012

Country Auto & Commercial Towing North Inc.
891 Saw Mill River Rd
Ardsley, NY 10502

T 1	T 2	T 3	T 4
8000	8000	8000	4000
			Diesel

7/30/2011 Diesel annular space sensor
in alarm mode - continued
was reported until CCMI
noticed it during their
annual inspection on 02/20/2012
and reported it to WCDO#
CCMI documented product
in annular space.
Still in alarm status as
of 9/2/2012

I reviewed weekly ^{↑ tank leak detection} records from
^{July 1st} August of 2011 through Sept 2, 2012
that recorded the diesel annular
space sensor in alarm mode continuously
in that time.

The facility produced an invoice
which showed that 60 gallons of
diesel was pumped from the tank on
Feb 22, 2012

continued →

9/6/2012

CPD Energy Corp
Mobil Service Station
Andsley, NY

CPD Environmental Compliance

Manager Joseph McCormick

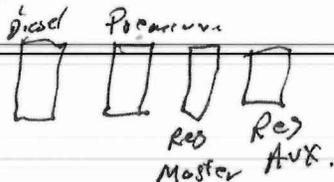
~~stated that he did not have~~
the key to the fill tube
for the diesel tank (it had a
padlock) so I was unable
to verify if the tank had
less than an inch of product in
it.

Sonoco Service Station
154 Delson Ave
Middletown, NY 10940

9/14/2012
@ 10:26
Sunny 74°

Annual line tightness test - all pass 8/12

Tank #5 Relined 3/1/08



Tank leak detection is done by
visually checking the sensor
reading each week and recording
it in a notebook on pages
preprinted

lec
ed
lis

Sensor 1 Normal

Sensor 2 Fuel Alarm - reported ~~at~~ ^{PM}

Sensor 3 Normal

Sensor 4 Normal

reported ~~at~~ ^{PM}
9/13/2012

Edgar stated they check sensor
status every Monday -

9/14/2012

Fort Market Mobil
1062 Route 9W
Fort Montgomery, NY 10922

Dec 2011 need L.D. record

June 11, 2012 Dispenser 1-2
Fuel Alarm - July 31, 2012

August 9, 2012 Sensor for Dispenser
1-2 Normal

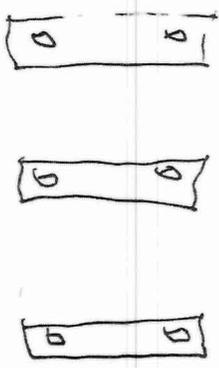
Super Sump - last normal
reading Aug 9, 2012 - in Alarm
mode on all print outs -
same no date but in arden-
st following Aug 9 cont'd
Sept 11, 2012 when still in alarm
mode. Normal when I
conducted the inspection



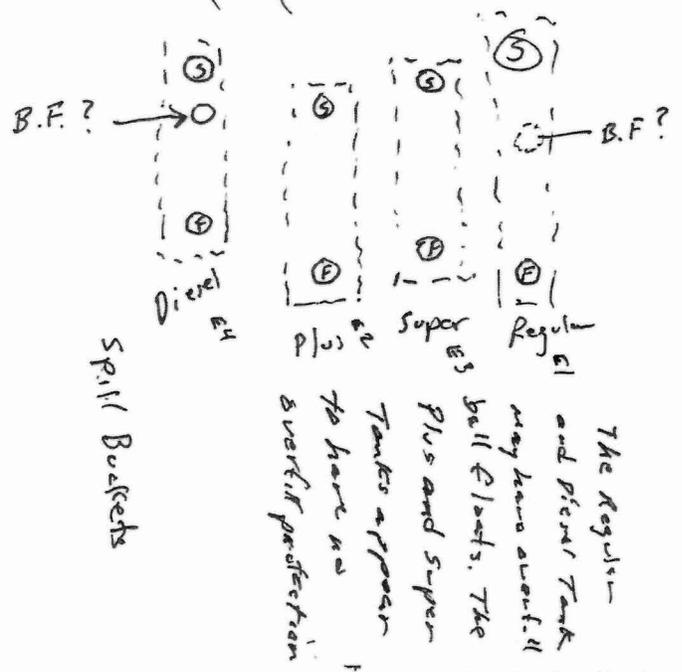
EXXON R/S 327229
209 RT 3E
Secaucus, NJ 07094

Tiger Mart

9/26/2012



Karfo



The Regular

and Dier's Tank
may have overflow
ball floats. The
Plus and Super
Tanks appear
to have no
overflow protection.

Spill Buckets



8/28/2013
11:15 - 12:10

226 Petroleum Inc
Forsal Park, NY
Mr Paul states Global has all records

Rect, for On
Volts DC 42
Amps 2.8

Tanks	1 & 2	Regular
Tank	3	Premium = Super
Tank	4	Diesel

Mr Paul says they stick the tanks daily.

No ^{1 Tank} LD Records on site
Newer than ~~12/2009~~ ^{12/2009} ~~12/2009~~ ^{12/2009} These
are 10 Inventory Reconciliation
worksheets

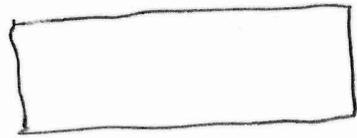
Warren Roser's Associates Inc. 1 800-~~667-5168~~ ⁵¹⁶⁸
with SIRH Report - not enough
readings to perform an
analysis

Tanks numbered left to right,
European suffix

8/28/2013
12:50 - 1:50

BP Station (Took over from
Geoff on 3/1/2013)
Indra Kumar Manager

4 3 2 1
R R P P



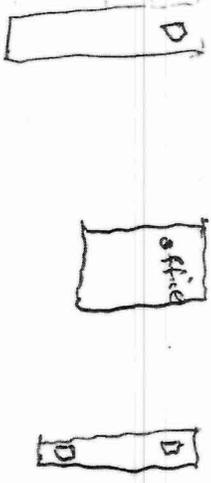
Reviewed passing 10 Day Inventory
Statistical Reconciliation Records
for previous year (7/12 - 8/13)

Reviewed passing Annual
line tightness test for
all 3 lines (Regulars are
manifolded).

8/29/88
10:05 - 11:30

755 White Plains Rd.
Getty ~~416~~ ~~Scarsdale~~ NY

not
W 5:30 PM
R. R. R. R.
P.M.



ALBERT K. BATAWI/A

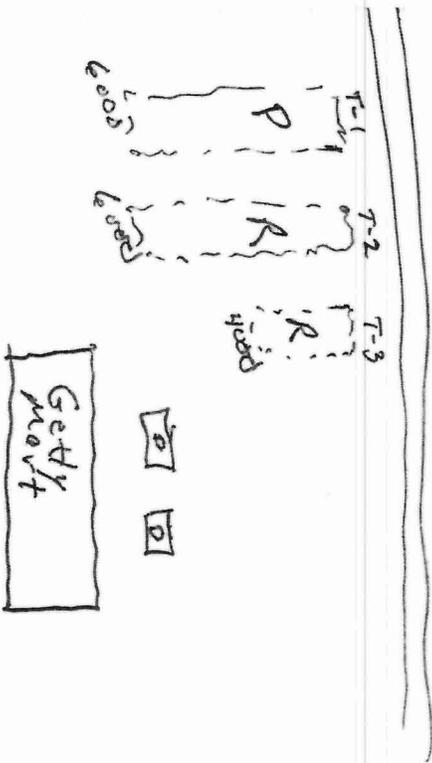
Sam Jacoby

8/29/13

8/30/13

Setty 416 Central Ave, Scarsdale, NY

Alan Vigna
Joe Flinter



I reviewed passing lipid status results for all three faks and line swaps for the previous 12 months.

Passing annual line tightness test for both lines (regional mandated)

8/29/13

Getly # 570 69 Bank St. White Plains, NY

Site non-operational.

It appears new UST systems were installed minus the dispensers, but the work was stopped and the facility never upgraded.

See photos

Impressed Current Cathodic Protection

Must inspect rectifier every 60 days and maintain records.

System must always be turned on.

Record voltage and amperage levels. Compare them with previous readings to see if they are consistent.

Read clock/hour gauge to determine if system has been on continuously since the last reading.

All CP Systems must be tested:

- Within 6 months of installation
- Every 3 years thereafter.
- Within 6 months after an UST system repair.

-850 mV with CP applied (on potential)

-850 mV Polarized Potential (instant off potential)

100 mV Polarization (used when polarized potential is less negative than -850 mV)

